

ACCEPTED/FILED

JUL 14 2015

Federal Communications Commission
Office of the Secretary

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
9300 East Hampton Drive
Capitol Heights, MD 20743

CC: 02-6

CC Docket No. 02-60

Request for Reconsideration

Secretary Dortch,

BEN: 16050459

Application Numbers: 868305, 834513, 834515, 834522, 834526, 868317
FRN: 2288765, 2274185, 2274185, 2372726, 2303782, 2372504, 2366877, 2373217

870317
Application # to
different Applicant

GOAL Academy is requesting reconsideration of the appeal denial dated April 16, 2014 by the Universal Service Administrative Company (USAC) reducing the above referenced FRNs on the entities listed. The reason for this appeal is that the State of Colorado does not yet assign individual school location codes to schools with multiple locations, only the main location is given the school code. This situation is very similar to what other schools have faced in other states when dealing with erate requests for multiple locations. (See references highlighted below). While the Colorado Department of Education is starting to realize that there is a need for a multiple location school database much like New York and possibly other states have developed, no such tool exists today.

The GOAL Academy School with its multiple physical locations is given only one school code by the Colorado Department of Education. Much like New York State has recognized, many schools have multiple instructional locations but are only given one state entity number that identifies the school as a whole, including the schools multiple physical locations, but does not issue a state school identification number to each individual school location.

We are asking for the Federal Communication Commission to waive the requirements that each of the schools physical entities receive a state school code. We additionally request the Erate program recognize that the Multiple Location Schools do exist and they meet the No Child Left Behind (NCLB) requirements. GOAL Academy as a school district entity is being recognized by the Colorado Department of Education (See Attached: GOAL Academy 2014 Verification) and all the students associated with the school including the Multiple Location Schools are receiving full funding from the state. The chartering district, Falcon School District, which is in charge of making sure that GOAL Academy and the Multiple Location Schools meets all of the NCLB requirements, has certified that GOAL Academy and its Multiple School Locations do meet NCLB. (See attached: GOAL Falcon 49 E-rate 4-29-14). Attached are multiple documents that state that GOAL Academy has and does meet the entire requirements put forth by the State of Colorado and NCLB.

In the State of Colorado, each student receives a designated funded amount sent to the school or school district for their education, which is determined by what is called the Long Bill. These Multi-Location Schools are currently being funded by State of Colorado through the Long Bill, but do not receive a separate school code for each of the schools multiple locations. The Colorado Department of Education assigns the schools main location a school code and funds all students associated with the school via one code. In GOAL Academy's case students are at Multiple School locations throughout the state.

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The states of New York and North Carolina (see attached: New York E-rate Elig Multi Location, and North Carolina E-rate Forum, Dec. 2009.) have solved the issue by developing a database where the Multi-Location Schools, like GOAL Academy and other Colorado Schools, have a database for the sole purpose of establishing the eligibility for E-rate. Based upon documents attached, E-rate is funding Multiple Location Schools in those states. With precedence already set by E-rate, GOAL Academy should also receive the same consideration as other schools in the nation.

We will be presenting to the Colorado Department of Education these other states solutions in hope that this will help solve this situation for other Colorado multi-location schools in the future to avoid this predicament. However, at this time that tool simply does not exist and will take time to develop. This funding year has come to an end and the Federal Communication Commission (FCC) is the last hope for 2012 -2013 funding for GOAL Academy and its students. It is a shame that GOAL Academy students, which are located in both rural and urban school locations will be punished because they are in a Multiple Location School receiving an education approved by Colorado Department of Education, but will potentially not receive the full consideration of educational erate funding simply because each individual physical location does not have a school code.

Background

In Colorado, the Department of Education has a lengthy definition of a school and its requirements. All schools that meet the strict definition receive a school code and are posted on the Colorado Department of Educations (CDE) website. Goal Academy is classified as a multi-district blended school with Multiple Location School (satellite facilities)¹. There are no provisions that allow for Multiple School Locations to receive a school code. Because there is no provision that allows for Multiple Location Schools, it potentially eliminates Goal Academy Multiple Locations and all Colorado schools in the same situation from receiving any E-rate funding; even though they meet NCLB requirements and the State of Colorado funds all of the students in the multiple locations. Again, Multiple Location Schools are physical locations where students receive instruction and support for their education. These Multiple Location Schools are a part of the district in the same way as all other schools are in the State of Colorado, but they are under one name and one code, but operate multiple locations.

Request

For the past 60 days, Goal Academy along with its chartering district, Falcon School District, has worked with the Colorado Department of Education to obtain certification that states Multiple Location Schools are in fact schools. Unfortunately, CDE is unable to verify these facilities as meeting the definition to receive a school code. However, this does not deem the facilities ineligible for E-rate support. School Districts have multiple facilities that provide support to students that are an intricate part of the student's ability to learn. These Multiple Location Schools provide services to students. GOAL Academy is requesting to the FCC accept a waiver for the Multiple School Location as stated in the Form 471 or stated at the beginning of this appeal be recognized as school entities that meet all the NCLB requirements and are allowed to participate and receive E-rate funding.

¹ Satellite Facilities: GOAL Academy-Phillips Center#16066220, GOAL Academy-Canon City#1606221, GOAL Academy-LaJunta#16066222, GOAL Academy Pagosa Springs#16066223, GOAL Academy Alamosa#1606606, Goal Academy Colorado Springs#1#16056650, GOAL Academy Colorado #2#16056651, GOAL Academy Fort Collins#1606604, GOAL Academy Grand Junction#16056653, GOAL Academy Greeley#16056655, GOAL Academy Longmont#16056652, GOAL Academy Pueblo#16050981, GOAL Academy Pueblo PHA#1606605, GOAL Academy - Lakewood#16062808, GOAL Academy- Pueblo2NIF#16068064 and GOAL-Aurora#16062810

Additional supporting documents.

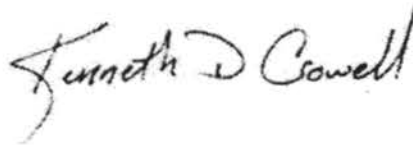
- "Copy of GOAL sites y 17" – show all of the site physical locations.
- "GOAL 471_y17 District Page 2)." - showing The Total number of students that have been funded by the Colorado Department of Education.
- "GOAL 3rd Party Verif. 2012" - Third party Verification from Colorado Department of Education
- "GOAL Accreditation 2013" – Chartering district letter of accreditation for GOAL Academy
- "GOAL cert letter signed 1.17.12" – 2012 Charter School Institute was the Chartering entity, stating that each satellite school is accredited.
- "GOAL cert Letter 5-4-2012" – Another letter from Charter School Institute when it was the chartering district stating that GOAL Academy and its satellite schools are accredited
- "GOAL Confirm school Falcon 49 E-rate 9.12.13 y 16" – 2013 Chartering districts confirms that GOAL Academy and its satellite schools are accredited.

Sincerely,



Jim Abrahamsen

ETECHCO
P.O. Box 469
Grand Lake, Colorado 80447
303-919-0842
Fax 501-637-5162
CRN 16061978
abrahamsenj@comcast.net



Kenneth Crowell

Executive Director
GOAL Academy
3621 West 73rd Ave.
Westminster, Colorado 80030
720-381-2874
Fax 720-446-2874
Kd.crowell@goalac.org

References

Exert from: http://www.e-ratecentral.com/us/nys/nysed/Multi-Location_School_Validation.doc

NYSED E-Rate Entity Eligibility for Multi-Location Schools

Introduction

Individual non-public schools in New York operating out of multiple sites have historically experienced difficulties validating the eligibility of each of their facilities for E-rate purposes. More recently, similar validation issues have arisen with respect to public school district and public library annexes, and to satellite BOCES operating facilities. The underlying problem stems from the difference between the way NYSED and USAC track schools, libraries, and facilities. With regard to schools in particular:

- Individual schools in New York are assigned unique LEA (or BEDS) Codes and are listed separately in the NYSED's SEDREF database. If a single school operates out of multiple locations, only its main address is indicated.
- E-rate procedures require USAC to track E-rate services to individual locations, each identified with a unique entity number. USAC must validate the eligibility of each entity as either a "school" or a Non-Instructional Facility ("NIF").

Although USAC has begun issuing guidelines for dealing with multi-location schools, it is still relying on the E-rate coordinators in the individual states to validate the eligibility of instructional or library sites not specifically identified as "schools" or "libraries" in state databases. The following procedures have been developed by NYSED, and reviewed with USAC, as a means of validating multi-location schools and libraries within New York State.

Implementation of a NYSED Multi-Location School Database

Rather than change its existing SEDREF database to accommodate multiple-site schools (or libraries), solely for E-rate purposes, NYSED has developed a separate Multi-Location School Database which may be utilized by USAC to validate the eligibility of individual school and library sites...

Exert from: http://www.e-ratecentral.com/us/nys/news/news2012/weekly_news_2012_1015_ny.asp

Schools and Libraries News Brief Dated October 12 – Program Eligibility

The [SLD News Brief for October 12, 2012](#), discusses the basic requirements for E-rate program eligibility for schools, libraries, and service providers.

Within New York, the following special points should be noted:

1. The first point of reference for PIA reviewers seeking to confirm the eligibility of New York schools is the NYSED online "SEDREF" database. Wherever possible, applicants should try to make sure that the entity names used for E-rate purposes match the SEDREF school names.
2. Many schools in New York, particularly private schools, have multiple physical locations, but are listed only as single schools for SEDREF purposes. In these cases, to validate the additional sites for E-rate purposes, we have developed — with USAC's concurrence — a special multi-location school ("MLS") certification process and associated online MLS database.
3. Within New York (but not in all states) Head Start students (3 years and older) and facilities are eligible. A listing of eligible Head Start organizations and/or schools is available online in the SLD's Eligibility Table for Non-Traditional Education.

**Schools and Libraries Universal Service Program
Services Ordered and Certification Form 471
Application Display**

Block 1

Block 2 & 3

Block 4

Block 5

Block 6

Misc

471 Application No: 868305

Funding Year: 7/1/2012 - 6/30/2013

Cert. Postmark Date: 03/19/2012

Form Status: CERTIFIED - In Window

RAL Date: 03/27/2012

Out of Window Letter Date: Not applicable

Applicant's Form Identifier: GOAL_471_y15 Web

Block 1: Billed Entity Information

Billed Entity Number: 16050459

FCC Registration Number: 0018692897

Applicant Name: GOAL ACADEMY

Address: 3621 W 73RD AVE, UNIT C

City: WESTMINSTER State: CO Zip: 80030-

Contact Name: Jim Abrahamsen

Address: 1879 South Lamar Ct.

City: Lakewood State: CO Zip: 80232

Type of Application: SCHOOL DISTRICT

Ineligible Orgs: N

Entity Sub-Type: Public Charter

Consultant Name: JIM ABRAHAMSEN

Name of Consultant's Employer: ETECHCO INC

Consultant's Address:

10 E JEFFERSON ST COLORADO SPRINGS CO

Consultant Registration Number : 16061978

[Previous](#)[Display Entire Application](#)

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**Schools and Libraries Universal Service Program
Services Ordered and Certification Form 471
Application Display**

Block 1

Block 2 & 3

Block 4

Block 5

Block 6

Misc

471 Application No: 834513

Form Status: CERTIFIED - In Window

Out of Window Letter Date: Not applicable

Funding Year: 7/1/2012 - 6/30/2013

RAL Date: 03/02/2012

Cert. Postmark Date: 02/23/2012

Applicant's Form Identifier: GOAL_471_y15 A

Block 1: Billed Entity Information

Billed Entity Number: 16050459

FCC Registration Number: 0018692897

Applicant Name: GOAL ACADEMY

Address: 3621 W 73RD AVE, UNIT C

City: WESTMINSTER State: CO Zip: 80030-

Contact Name: Jim Abrahamen

Address: 1879 South Lamar Ct

City: Lakewood State: CO Zip: 80232

Type of Application: SCHOOL DISTRICT

Ineligible Orgs: N

Entity Sub-Type: Public Charter

Consultant Name: JIM ABRAHAMSEN

Name of Consultant's Employer: ETECHCO INC

Consultant's Address:

10 E JEFFERSON ST COLORADO SPRINGS CO

Consultant Registration Number : 16061978

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**Schools and Libraries Universal Service Program
Services Ordered and Certification Form 471
Application Display**

Block 1

Block 2 & 3

Block 4

Block 5

Block 6

Misc

471 Application No: 834515

Funding Year: 7/1/2012 - 6/30/2013

Cert. Postmark Date: 02/14/2012

Form Status: **CERTIFIED - In Window**

RAL Date: 02/23/2012

Out of Window Letter Date: Not applicable

Applicant's Form Identifier: GOAL_471_y15 B

Block 1: Billed Entity Information

Billed Entity Number: 16050459

FCC Registration Number: 0018692897

Applicant Name: GOAL ACADEMY

Address: 3621 W 73RD AVE, UNIT C

City: WESTMINSTER State: CO Zip: 80030-

Contact Name: Jim Abrahamsen

Address: 1879 South Lamar Ct

City: Lakewood State: CO Zip: 80232

Type of Application: SCHOOL DISTRICT

Ineligible Orgs: N

Entity Sub-Type: Public Charter

Consultant Name: JIM ABRAHAMSEN

Name of Consultant's Employer: ETECHCO INC

Consultant's Address:

10 E JEFFERSON ST COLORADO SPRINGS CO

Consultant Registration Number : 16061978

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Schools and Libraries Universal Service Program
Services Ordered and Certification Form 471
Application Display

Block 2 & 3 **Block 4** **Block 5** **Block 6** **Misc**

471 Application No: 834522

Funding Year: 7/1/2012 - 6/30/2013

Cert. Postmark Date: 03/19/2012

Form Status: CERTIFIED - In Window

RAL Date: 03/27/2012

Out of Window Letter Date: Not applicable

Applicant's Form Identifier: GOAL_471_y15 C

Block 1: Billed Entity Information

Billed Entity Number: 16050459

FCC Registration Number: 0018692897

Applicant Name: GOAL ACADEMY

Address: 3621 W 73RD AVE, UNIT C

City: WESTMINSTER State: CO Zip: 80030-

Contact Name: Jim Abrahamsen

Address: P.O. Box 469

City: Grand Lake State: CO Zip: 80447

Type of Application: SCHOOL DISTRICT

Ineligible Orgs: N

Entity Sub-Type: Public Charter

Consultant Name: JIM ABRAHAMSEN

Name of Consultant's Employer: ETECHCO INC

Consultant's Address:

10 E JEFFERSON ST COLORADO SPRINGS CO

Consultant Registration Number : 16061978

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**Schools and Libraries Universal Service Program
Services Ordered and Certification Form 471
Application Display**

Block 2 & 3 **Block 4** **Block 5** **Block 6** **Misc**

471 Application No: 834515

Funding Year: 7/1/2012 - 6/30/2013

Cert. Postmark Date: 02/14/2012

Form Status: CERTIFIED - In Window

RAL Date: 02/23/2012

Out of Window Letter Date: Not applicable

Applicant's Form Identifier: GOAL_471_y15 B

Block 1: Billed Entity Information

Billed Entity Number: 16050459

FCC Registration Number: 0018692897

Applicant Name: GOAL ACADEMY

Address: 3621 W 73RD AVE, UNIT C

City: WESTMINSTER State: CO Zip: 80030-

Contact Name: Jim Abrahamsen

Address: P.O. Box 469

City: Grand Lake State: CO Zip: 80447

Type of Application: SCHOOL DISTRICT

Ineligible Orgs: N

Entity Sub-Type: Public Charter

Consultant Name: JIM ABRAHAMSEN

Name of Consultant's Employer: ETECHCO INC

Consultant's Address:

10 E JEFFERSON ST COLORADO SPRINGS CO

Consultant Registration Number : 16061978

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**Schools and Libraries Universal Service Program
Services Ordered and Certification Form 471
Application Display**

Block 1 **Block 2 & 3** **Block 4** **Block 5** **Block 6** **Misc**

471 Application No: 834526

Funding Year: 7/1/2012 - 6/30/2013

Cert. Postmark Date: 03/19/2012

Form Status: CERTIFIED - In Window

RAL Date: 03/27/2012

Out of Window Letter Date: Not applicable

Applicant's Form Identifier: GOAL_471_y15 D

Block 1: Billed Entity Information

Billed Entity Number: 16050459

FCC Registration Number: 0018692897

Applicant Name: GOAL ACADEMY

Address: 3621 W 73RD AVE, UNIT C

City: WESTMINSTER State: CO Zip: 80030-

Contact Name: Jim Abrahamsen

Address: P.O. Box 469

City: Grand Lake State: CO Zip: 80447

Type of Application: SCHOOL DISTRICT

Ineligible Orgs: N

Entity Sub-Type: Public Charter

Consultant Name: JIM ABRAHAMSEN

Name of Consultant's Employer: ETECHCO INC

Consultant's Address:

10 E JEFFERSON ST COLORADO SPRINGS CO

Consultant Registration Number : 16061978

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**Schools and Libraries Universal Service Program
Services Ordered and Certification Form 471
Application Display**

Block 1 **Block 2 & 3** **Block 4** **Block 5** **Block 6** **Misc**

471 Application No: 870317

Funding Year: 7/1/2012 - 6/30/2013

Cert. Postmark Date: 03/19/2012

Form Status: CERTIFIED - In Window

RAL Date: 03/27/2012

Out of Window Letter Date: Not applicable

Applicant's Form Identifier: GOAL_471_y15 E-mail

Block 1: Billed Entity Information

Billed Entity Number: 16050459

FCC Registration Number: 0018692897

Applicant Name: GOAL ACADEMY

Address: 3621 W 73RD AVE, UNIT C

City: WESTMINSTER State: CO Zip: 80030-

Contact Name: Jim Abrahamsen

Address: P.O. Box 469

City: Grand Lake State: CO Zip: 80447

Type of Application: SCHOOL DISTRICT

Ineligible Orgs: N

Entity Sub-Type: Public Charter

Consultant Name: JIM ABRAHAMSEN

Name of Consultant's Employer: ETECHCO INC

Consultant's Address:

10 E JEFFERSON ST COLORADO SPRINGS CO

Consultant Registration Number : 16061978

[Previous](#)[Display Entire Application](#)

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Entry Number: 14050499 Applicant's Form Identifier: GOAL_471_FY17 Ethernet
 Contact Person: Jim Abrahamsen Contact Phone Number: 303 919-0842 Worksheet - 140466
 Block 4: Discount Calculation Worksheet Page 1 of 1

The Block 4 worksheet is used to calculate your discount for services. You will complete one or more worksheets depending on the type of application you are filing. If you file more than one worksheet, please number the completed worksheets to assure that they are all processed correctly. Please refer to the instructions for information specific to the type of application you indicated in Block 1, Item 5.

☐ Check here if this worksheet contains all eligible entities in the school district or library system.

2a List entities and calculate discounts (a): (For Administrator's Use)
 School District or Library System Name: School District or Library System Entry Number:

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	
Name of Entity Entry	Entry Number (USD 6753, State or Federal, or 223 Case for Library)	Entity Type (A, B, or C)	Total Number of Students	Number of Students Eligible for Discount	Percent of Students Eligible for Discount (Col 4 ÷ Col 3)	One-time Fee (Col 6 × Col 5)	New Game Fee (Col 7 × Col 5)	Adult Entry Fee (Col 8 × Col 5)	Arts Fee (Col 9 × Col 5)	On-site Product or Educational Service Discount (Col 10 × Col 5)	Staff Association Discount (Col 11 × Col 5)	Adult Education & Family Services Discount (Col 12 × Col 5)	Entry Number of School District or Library System	Discount of Member Entry	Shared Discount
All Entities															
SCHOOL DISTRICTS															
GOAL ACADEMY PUEBLO	14050499	U	431	263	65.00%	00	N	N	N	34680					
GOAL ACADEMY TRINIDAD	14071187	U	493	20	5.27%	40	N	N	N	19720					
GOAL ACADEMY COLORADO SPRINGS	14050451	U	129	84	65.11%	00	N	N	N	10320					
GOAL ACADEMY SOUTHWEST	14050452	U	114	81	71.05%	00	N	N	N	9120					
GOAL ACADEMY SAND HATCH	14050453	U	141	60	50.36%	00	N	N	N	11280					
GOAL ACADEMY WESTMINSTER	14050454	U	94	70	74.46%	00	N	N	N	7520					
GOAL ACADEMY REEDLEY	14050455	U	278	189	72.10%	00	N	N	N	22080					
GOAL ACADEMY ANDOVER	14050456	U	72	54	75.00%	00	N	N	N	6480					
GOAL ACADEMY ALBUQUERQUE	14050457	U	60	32	53.33%	00	N	N	N	7360					
GOAL ACADEMY PHILIPS CENTER	14050458	U	109	91	83.48%	00	N	N	N	8810					
GOAL ACADEMY CARMEL	14050459	U	137	103	75.19%	00	N	N	N	12330					
GOAL ACADEMY ALBUQUERQUE	14050460	U	75	50	66.67%	00	N	N	N	6000					
GOAL ACADEMY PASADENA	14050461	U	55	34	61.82%	00	N	N	N	4720					
GOAL ACADEMY PUEBLO PMA	14050462	U	305	204	66.88%	00	N	N	N	27450					
GOAL ACADEMY ALBUQUERQUE	14050463	U	32	20	62.50%	00	N	N	N	2880					
GOAL ACADEMY PUEBLO JNF	14050464	U	0	0	0.00%	00	N	N	N	0					
GOAL ACADEMY GRACIA	14071188	U	70	48	68.57%	00	N	N	N	5900					
GOAL ACADEMY COLORADO SPRINGS	14050465	U	769	502	65.28%	00	N	N	N	33210					
GOAL ACADEMY KANAB	14073428	U	10	0	0.00%	00	N	N	N	900					
GOAL ACADEMY JAVITA	14073429	U	10	0	0.00%	00	N	N	N	900					
GOAL ACADEMY PUEBLO REGENCY	14073154	U	10	0	0.00%	00	N	N	N	900					
GOAL ACADEMY PORTER	14073155	U	10	0	0.00%	00	N	N	N	900					
GOAL ACADEMY FOURTH VALLEY	14073156	U	10	0	0.00%	00	N	N	N	900					
2b Shared Services															
SCHOOL DISTRICTS (including groups of schools within school districts) Calculate the total of Columns 4 and 11. Divide the total of Column 11 by the total of Column 4. Enter the result in Column 15.			3048							23480				77%	
LIBRARY SYSTEMS. Calculate the total of Column 7. Divide this total by the number of public libraries. Enter the result in Column 15.															
CONSORTIA. Calculate the total of Column 14. Divide this total by the number of member entities. Enter the result in Column 15.															



COLORADO DEPARTMENT OF EDUCATION

UNIT OF FEDERAL PROGRAM ADMINISTRATION

1560 Broadway, Suite 1450 • Denver, Colorado 80202-5149
303.866.6600 • 303.866.6782 • www.cde.state.co.us

Robert K. Hammond
Commissioner of Education

Keith Owen, Ph.D.
Deputy Commissioner

APRIL 28, 2014

Jim Abrahamsen
Etechco, Inc.
10 E. Jefferson St.
Colorado Springs, CO 80907

Dear Mr. Abrahamsen,

The Colorado Department of Education (CDE) verifies the following schools meet the definition of a school as defined by the Colorado Department of Education and has reported the following Free and Reduced lunch data.

School name	K-12 Count	Free Lunch	Reduced Lunch	Not Eligible	Free and Reduced	% Free	% Reduced	% Free and Reduced
GOAL ACADEMY	3,149	1,656	441	1,037	2,097	52.59%	14.00%	66.59%

Should you need additional information feel free to contact me.

Thank you,

DeLilah Collins
E-rate Coordinator
Tel. - 303.866.6850
Email: collins_d@cde.state.co.us

cde

COLORADO DEPARTMENT of EDUCATION

NYSED E-Rate Entity Eligibility for Multi-Location Schools

Introduction

Individual non-public schools in New York operating out of multiple sites have historically experienced difficulties validating the eligibility of each of their facilities for E-rate purposes. More recently, similar validation issues have arisen with respect to public school district and public library annexes, and to satellite BOCES operating facilities. The underlying problem stems from the difference between the way NYSED and USAC track schools, libraries, and facilities. With regard to schools in particular:

- Individual schools in New York are assigned unique LEA (or BEDS) Codes and are listed separately in the NYSED's SEDREF database. If a single school operates out of multiple locations, only its main address is indicated.
- E-rate procedures require USAC to track E-rate services to individual locations, each identified with a unique entity number. USAC must validate the eligibility of each entity as either a "school" or a Non-Instructional Facility ("NIF").

Although USAC has begun issuing guidelines for dealing with multi-location schools, it is still relying on the E-rate coordinators in the individual states to validate the eligibility of instructional or library sites not specifically identified as "schools" or "libraries" in state databases. The following procedures have been developed by NYSED, and reviewed with USAC, as a means of validating multi-location schools and libraries within New York State.

Implementation of a NYSED Multi-Location School Database

Rather than change its existing SEDREF database to accommodate multiple-site schools (or libraries), solely for E-rate purposes, NYSED has developed a separate Multi-Location School Database which may be utilized by USAC to validate the eligibility of individual school and library sites. This database is hosted on the NYSED E-Rate Resource Center Web site maintained by E-Rate Central (<http://www.e-ratecentral.com/us/nys/nysed/index.asp>).

The responsibility for submitting and updating site data for NYSED's Multi-Location School Database rests with the applicants themselves. New York applicants wishing to have their sites listed in the database must submit a formal certifying letter to NYSED as per the attached format. The letter should list the addresses of all its physical sites, indicating whether each site is instructional (i.e., with classrooms or public library access) or is purely administrative (i.e., a "NIF").¹ Upon review, the site listings will be added or updated in the NYSED Multi-Location School Database.

¹ Summer school camps operated by some parochial schools may be included in this listing if, and only if, they are providing primary or secondary education and are recognized as schools in the NYSED Child Nutrition System (i.e., feeding sites eligible for four meals per day).

Schools or libraries seeking listing in the NYSED Multi-Location School Database are encouraged to submit their certification letters as early as possible in the E-rate funding cycle, preferably before their E-rate applications have been reviewed by USAC's Program Integrity Assurance ("PIA").² Schools that have not been assigned E-rate entity numbers for all their sites should do so beforehand by calling USAC's Client Service Bureau (888-203-8100).

Important E-Rate Implications

The following implications should be noted when a multi-location school or library files its E-rate application:

1. Recent USAC guidance indicates that an individual, non-public, multi-location school should file a "school" application, not a "district" application.
2. The discount rate for a multi-location school or library will be calculated as if it was a single school or library (i.e., the applicant should use a matrix discount based on the school's total enrollment and the total number of eligible students). This should be easy for a multi-location school which is treated as a single feeding site in the NYSED Child Nutrition System. For Block 4 purposes, the main school or library location (associated with the Billed Entity Number) should be listed first, together with the total student numbers. All other sites should be listed with zero students, the entire school's or library's discount rate, and an indication that the zero-student discount rate is based on an Alternative Discount Mechanism.
3. Note that a "school" or "library" applying for Internal Connections funding will be subject to the Two-in-Five Rule as a single entity. Internal Connections at one site, therefore, will count as a year's worth of eligibility for the entire school or library.

Additional Information

New York applicants seeking additional information on the NYSED Multi-Location School Database, including certification requirements and E-rate implications, should e-mail:

Winston E. Himsworth
E-Rate Central
whimsworth@e-ratecentral.com

² If PIA finds a school or library with unlisted sites, we recommend that the school ask PIA to defer action for a reasonable period until the school or library can provide NYSED with updated site information and the online database can be updated accordingly.

Draft Certification Letter
To be placed on school letterhead
It may be faxed to NYSED at (518) 473-4884

<Date>

Mr. Michael Tracy-Ireland
New York State Education Department
89 Washington Avenue, Room 317
Albany, New York 12234

Ref: NYS BEDS Code: <enter>
School name: * <enter>
Main address: <enter>

E-Rate School Name: *
E-Rate Billed Entity Number (BEN): <enter>

Please be advised that our school, which is listed by NYSED as a single school under the above referenced BEDS Code, has two or more physically separate sites. For E-rate filing purposes, each of these sites is considered a separate entity. Please include our school and our multiple facilities (as listed below) in the NYSED Multi-Location School database.

Entity No.	Facility Name*	Facility Address	Type**

Please add additional table rows, if required.

* Please use school and facility names as they appear in the NYSED and E-rate entity databases.

** Facility Type Codes: IF = Instruction Facility (with classrooms)
NIF = Non-Instructional Facility (no classrooms)
SSS = Separate Summer School (or "camp")

Certifications (please include only those applicable):

1. I certify that all Instructional Facilities ("IF") are operated by our school and are used to provide elementary and/or secondary educational services to our school's students. Any other use of these facilities has been and/or will be allocated out of any E-rate funding requests.

2. I certify that all Non-Instructional Facilities ("NIF") are used only by school employees for school business. Any other use of these facilities has been and/or will be allocated out of any E-rate funding requests.
3. I certify that the Separate Summer School ("SSS") is operated by our school, is used to provide elementary and/or secondary educational services to our school's students, and is recognized as a school in the NYSED Child Nutrition System. Any other use of this facility has been and/or will be allocated out of any E-rate funding requests.

Signed: _____
Printed Name: _____
Title: _____
Telephone: _____
E-mail: _____
Date: _____

Copy to: E-Rate Central
400 Post Avenue, Suite 410
Westbury, NY 11590-2291
Fax: (516) 801-7811

Headlines:

- FY 2008 – FY 2010 Funding Status
- Invoicing and Funds Disbursements — Part 2
- E-Rate Updates and Reminders
- Schools and Libraries News Brief dated December 11th — Entity Numbers (2)

Introduction

The North Carolina E-Rate Forum ("NCEF"), a complementary weekly newsletter provided by E-Rate Central in cooperation with the North Carolina Department of Public Instruction.

FY 2008 – FY 2010 Funding Status

Wave 75 for FY 2008 is scheduled for release on December 16th for \$1.9 million — none for North Carolina. Cumulative FY 2008 funding currently stands at \$2.44 billion. The Priority 2 funding threshold for FY 2008 has been finalized at 87%.

Wave 32 for FY 2009 is scheduled for release on December 15th for \$149 million, including almost \$3 million for nine North Carolina applicants. This brings cumulative FY 2009 funding to \$1.83 billion, including \$44.6 million for North Carolina. Priority 2 funding for this year is currently being approved at 80% and above, and denied at 54% and below.

The Form 471 application window for FY 2010 was opened on December 3rd and will close at 11:59 p.m. EST on Thursday, February 11, 2010. Although valid Form 470s for FY 2010 may be posted as late as January 14, 2010, we strongly advise applicants to file them this week or next so as to provide adequate time, after waiting the required 28 days, to select vendors, sign contracts, and file Form 471s.

A few words about E-rate deadlines: When asked about closing time, Disneyworld employees are instructed to respond "the park will remain open until 8 p.m.," not to say that "the park closes at 8 p.m." The subtle distinction is meant to convey an invitation to stay and have fun until the very last minute. USAC would do well to try reverse psychology. Too many applicants wait until the last minute to file and, as a result, make silly errors, encounter system problems, and/or miss the deadline entirely. Disneyworld employees, if retrained by USAC, might be instructed to say: "The park closes at 8 p.m. (or 11:59 p.m. EST in the E-rate case) but, if you wait until then, it will take you forever to get out of the parking lot — and you may very well spoil an otherwise wonderful day."

Invoicing and Funds Disbursements — Part 2

This is the second in a multi-part series of articles focusing on BEAR and SPI invoicing review, problem identification, and correction. Part 1 of the series¹ reviewed the difference between service provider invoices ("SPIs") for discounted services and applicant BEAR reimbursement invoices for undiscounted services. It also reviewed the use of E-Rate Central's Funding Quick Search tool to track invoice submission and approval. Part 2 discusses the two polar cases of 0% and 100% disbursements.

0% Utilization:

Unless an invoice has yet to be filed or is still under review by USAC, the only time a funded FRN should show a zero disbursement is when the associated service is never actually used. If this is the case, the applicant should consider one of the two following options:

1. If a similar service from a second provider was also funded, it may be possible to obtain a SPIN change on the first provider's FRN to cover the excess usage on the second service. As an example, an applicant may file two funding requests for cellular service with different carriers, but end up using only one (with total charges exceeding the initial estimate). Note that SPIN change requests must be filed before the invoice deadline. If the need for a SPIN change is identified after the deadline (e.g., for FY 2008 recurring services), an invoice deadline extension request must first be filed and approved before the SPIN change request is submitted.
2. If awarded funding is simply not needed, in whole or in part, the applicant should file a Form 500 to cancel or reduce the funding on that FRN. This will free up funding that may be needed to fund other applicants. (Note that if an FRN is canceled with a Form 500, the funding history will indicate that the FRN was "Not Funded," with no reason shown.)

In all other cases, zero funding indicates a problem. Two specific situations should be noted:

1. Neither the applicant nor the service provider filed an invoice. Most typically this occurs when an applicant incorrectly assumes the service provider was discounting its bills and, as a result, fails to file a BEAR for discount reimbursement. This is indeed an unfortunate situation — one that we see all too frequently. It means that an applicant has successfully gone through the entire application process, was awarded funding, but ultimately failed to receive any benefit at all. This situation can be identified in an applicant's funding history by looking at the disbursed amount, which will be "0," and at the payment mode, which will indicate "Not Set" (i.e., neither "SPI" nor "BEAR"). Assuming the invoicing deadline is past, the only way to recover from this situation is to request an invoice deadline extension.
2. If the disbursed amount, instead of being "0," indicates "\$0.00," it means that the SPI or BEAR invoice for that FRN was denied. This is a situation that USAC refers to as "Pass

¹ See http://www.e-ratecentral.com/archive/News/News2009/weekly_news_2009_1130.asp#b2.

Zero." Often the invoice denial is for a problem that can be easily corrected — but only if the applicant or service provider notices the denial. An applicant receiving a BEAR notification letter should carefully check to make sure that the authorized disbursement amount is not \$0.00. An invoice so denied can be corrected and resubmitted (but often only after requesting an invoice deadline extension).

100% Utilization:

A common misunderstanding regarding E-rate funding is that 100% disbursements are good, and that anything less is bad. This is not always the case. Indeed, it is only the case when actual service charges match the originally approved or adjusted pre-discount amount.

For fixed price service contracts, fully utilized over the course of a year, 100% disbursements are the norm. But for services whose charges vary with actual usage (e.g., monthly telephone or cellular services), such is not the case. In these situations, it would be highly coincidental if actual usage exactly matched originally estimated and funded usage. 100% utilization can be indicative of either of the following problems:

1. The applicant underestimated actual usage in its original application. Consider, for example, a 60% discount applicant who had estimated \$1,000 in annual usage and had been awarded a discount for the entire \$600, but who had actually used \$1,500 of service. Since discounts are capped by the awarded amount, the applicant would have received only \$600 in discounts. That would show up as a 100% disbursement, but actually would have meant the loss of \$300 in potential discounts on the extra \$500 of usage. This is not to suggest that applicants should routinely inflate their funding requests, but that a modest margin for growth is appropriate. For variably priced services, we view utilization rates in the neighborhood of 90% to represent an effective use of E-rate.
2. In some cases — hopefully few and far between — 100% disbursements represent a fundamental misunderstanding of the E-rate discount process. E-rate is a discount program, not a grant program. An applicant is entitled to a discount, up to its awarded amount, but only on services actually used. It is improper to invoice USAC for 100% funding simply because that amount was awarded.

If full funding is not utilized to any significant degree, applicants are strongly urged to file Form 500s to reduce funding to the level of actual usage. In addition to being good for the program, this will have the effect increasing reported utilization rates to 100% — perhaps avoiding the need to explain less than 100% utilization to those unfamiliar with the E-rate program.

E-Rate Updates and Reminders

SLD Issues First RALs for FY 2010:

The first batch of Receipt Acknowledgment Letters ("RALs") for early-filed FY 2010 applications was issued on December 10th. These letters give applicants an opportunity to make

corrections to many items of their Form 471 applications. Corrections are due 20 days after the RAL release date which, in this case, is December 30th. Note that the application filing deadline is six weeks after this date, which means any items that cannot be corrected through the RAL process can be re-filed in a new application.

FCC Reply Comments on Broadband and E-Rate:

Last Friday was the deadline for filing reply comments to the FCC's inquiry on E-rate, education, and the National Broadband Plan. One point of almost universal agreement is that the E-rate funding cap needs to be raised. Some of the more important and interesting reply comments were filed by:

- AT&T²
- Bill & Melinda Gates Foundation³
- E-Rate Central⁴
- State E-Rate Coordinators' Alliance⁵
- National Association of Telecommunications Officers and Advisors⁶

This inquiry was one of eighteen initiated by the FCC as a part of its development of a National Broadband Plan. We do not expect any formal FCC reaction to these E-rate comments until the Plan is submitted to Congress on February 17, 2010.

Invoice Deadline Extensions:

Late last week, the SLD approved a number of invoice deadline extension requests for FY 2008 recurring services. The approvals extend the original deadline of October 28, 2009, until April 12, 2010 (120 days, plus the weekend, after the extension approval date). More extension approvals are expected shortly. The new invoice deadlines are posted on an FRN-by-FRN basis in the SLD's FRN Extension Status table.⁷ Both applicants and service providers are also being notified directly.

Schools and Libraries News Brief dated December 11th — Entity Numbers (2)

The SLD News Brief for December 11, 2009,⁸ is Part 2 of a series discussing entity numbers. The first part provided a general overview and provided guidance on finding an existing entity

² See <http://fjallfoss.fcc.gov/ecfs/document/view?id=7020352662>.

³ See <http://fjallfoss.fcc.gov/ecfs/document/view?id=7020352268>.

⁴ See <http://fjallfoss.fcc.gov/ecfs/document/view?id=7020352379>.

⁵ See <http://fjallfoss.fcc.gov/ecfs/document/view?id=7020352670>.

⁶ See <http://fjallfoss.fcc.gov/ecfs/document/view?id=7020352637>.

⁷ See http://www.sl.universalservice.org/utilities/FRN_CurFundExt.asp.

⁸ See <http://www.universalservice.org/sl/tools/news-briefs/preview.aspx?id=271>.

number, correcting entity information, or applying for a new entity number. This second part discusses the following entity types:

- Buildings located on the same campus
- School or library buildings under construction
- Non-instructional facilities
- Single entities with multiple locations

For the most part, information on the first three types is a review. The subsection on the fourth type, however, provides the most detailed information on multi-location schools that has been made available to applicants aside from a short discussion during this fall's SLD training sessions.

A multi-location school is one that is operated out of two or more sites but is considered a single school by its state's department of education. A K-12 school, for example, might have primary students in one location, secondary students in a second, and an administrative office in a third. Often these are non-public schools, but other examples might include an annex (not on the same campus) to one district school or, at least potentially, a separate library building. There have long been questions about how to calculate the discount for a multi-location school, how to validate the eligibility of the various locations, and how to apply the 2-in-5 Rule for Internal Connections.

This subsection of the News Brief addresses the first of these issues. In brief, the multi-location school's discount rate will be based on the school's total student enrollment and total student eligibility. In the past, many such schools filed as "districts," calculating discount rates for each location, and averaging them for an aggregate school discount rate. Under the new guidance, there will be one student eligibility percentage and one matrix discount rate for the entire school.

For purposes of the Block 4, each site will be listed with its own entity number, but total student counts will be shown only for the "main" location. The other entity entries in the Block 4 will show zero students, use the same discount rate as the main location, and indicate that the rate is based on a non-matrix discount. The News Brief provides slightly different guidance for the following scenarios:

1. Single entity ("school" would be a better term) with multiple locations;
2. Single entity, multiple locations, when the main location does not have classrooms; and
3. Single entity, multiple locations, when the main location is partially eligible (e.g., a non-profit agency that runs Head Start facilities and also conducts other charitable activities) as a NIF.

Last week's News Brief does not address the entity validation and 2-in-5 Rule issues, but hopefully these will be addressed shortly. In the interim, we offer the following guidance:

1. The SLD's new guidance implicitly recognizes the eligibility of multi-location classrooms sites in what a state designates as a single school, but does not indicate how it will attempt to validate these sites as eligible, instructional entities. This is potentially

problematic because the states do not always have information on the additional sites. Ultimately, the SLD may ask the schools to self-certify these sites, much like it does for non-instructional facilities ("NIFs"). In the meantime, state coordinators may be asked to validate multi-location school sites.

2. The applicability of the 2-in-5 Rule to multi-location schools has not been addressed. In response to a question during the fall training, the SLD suggested that the 2-in-5 Rule would apply to the school in its entirety (i.e., Internal Connections work done at any one site would count as a year's worth of eligibility for the school as a whole). It is not clear, however, how the SLD's 2-in-5 tracking system, based on individual entity numbers, would apply in this case (much less retroactively). Absent further guidance, we recommend that applicants undertaking work in only one site reference only that site's entity number in its Block 5 funding request(s).

Newsletter information and disclaimer: This newsletter may contain unofficial information on prospective E-rate developments and/or may reflect E-Rate Central's own interpretations of E-rate practices and regulations. Such information is provided for planning and guidance purposes only. It is not meant, in any way, to supplant official announcements and instructions provided by the SLD, FCC, or NCDPI.

Additional North Carolina specific E-rate information is available through our Web site — <http://www.e-ratecentral.com/us/stateInformation.asp?state=NC>. Note that this site provides easy access to formatted North Carolina applicant E-rate histories via the Billed Entity Number ("BEN") search mechanism in the upper left-hand corner. Detailed information can be obtained by "drilling down" using the links for specific funding years and individual FRNs.

If you have received this newsletter from a colleague and you would like to receive your own copy of the North Carolina E-Rate Forum, send an e-mail to join-ncerate@lists.dpi.state.nc.us. Please include your name, organization, telephone, and e-mail address.

GOAL Academy
2013-2014 Locations
E-rate y 17

ACCEPTED/FILED

OCT 16 2014

DOCKET FILE COPY ORIGINAL
Federal Communications Commission
Office of the Secretary

cc: b2-6

Name	Address	City	ST	zip	County	Phone	Fax	BEN
Goal Academy - District	3621 W. 73 rd Ave.	Westminster	CO	80030	Adams	877-776-4625	720-746-2817	16050459
GOAL Academy Pueblo #2 Pueblo NIF Main (Office)	107 W. 11 th Street	Pueblo	CO	81003	Pueblo	877-776-4625	720-746-2817	16068064
GOAL Academy Pueblo #1 Pueblo Mall	3273 Dillon Drive	Pueblo	CO	81008	Pueblo	877-776-4625	720-746-2817	16050981
GOAL Academy Colorado Springs #1 Citadel	750 Citadel Drive East Unit 3136	Colorado Springs	CO	80909	El Paso	877-776-4625	720-746-2817	16056650
GOAL Academy Colorado Springs #2 Chapel Hills	1710 Briargate Blvd.	Colorado Springs	CO	80920	El Paso	877-776-4625	720-746-2817	16056651
GOAL Academy Longmont	321 Main St	Longmont	CO	80501	Boulder	877-776-4625	720-746-2817	16056652
GOAL Academy Grand Junction - Mesa Mall	2424 Highway 6 & Highway 50	Grand Junction	CO	81505	Mesa	877-776-4625	720-746-2817	16056653
GOAL Academy Westminster	3621 W. 73 rd Ave.	Westminster	CO	80030	Adams	877-776-4625	720-746-2817	16056654
GOAL Academy Greeley	2804 Greeley Mall	Greeley	CO	80631	Weld	877-776-4625	720-746-2817	16056655
Goal Academy Aurora - Town Center	14200 E. Alameda Ave.	Aurora	CO	80012	Arapahoe	877-776-4625	720-746-2817	16062810
GOAL Academy Denver Tramway	3532 Franklin Street	Denver	CO	80205	Denver	877-776-4625	720-746-2817	16066220
GOAL Academy Canon City	402 Royal Gorge Blvd.	Canon City	CO	81212	Fremont	877-776-4625	720-746-2817	16066221
GOAL Academy - La Junta	421 W. 3rd Street	La Junta	CO	81050	Otero	877-776-4625	720-746-2817	16066222
GOAL Academy- Pagosa Spr.	100 County Center Suite L	Pagosa Springs	CO	81147	Archuleta	877-776-4625	720-746-2817	16066223
GOAL Academy - Lakewood	7475 West Colfax Ave. Suite 102	Lakewood	CO	80214	Jefferson	877-776-4625	720-746-2817	16062808
Goal Academy - Pueblo - PHA - Pueblo Housing Authority (Pueblo Downtown)	205 N Santa Fe Ave	Pueblo,	CO	81003	Pueblo	877-776-4625	720-746-2817	16066605
GOAL Academy - Craig	111 W. Victory Way, Suite 123	Craig	CO	81625	Moffat	877-776-4625	720-746-2817	16071786
GOAL Academy - Trinidad	155 East First Street	Trinidad	CO	81082	Laos Animas	877-776-4625	720-746-2817	16071787